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AKA ICE CUBE, AND JEFF KWATINETZ

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

BIG3 LLC, a limited liability
company; O'SHEA JACKSON a/k/a
ICE CUBE, an individual; and JEFF
KWATINETZ, an individual;

Plaintiff,

vs.

Ahmed Al-Rumaihi, an individual;
Faisal Al-Hamadi, an individual;
Ayman Sabi, an individual; Sheikh
Abdullah bin Mohammed bin Sau Al
Thani, an individual and as CEO of
Qatar Investment Authority; DOES 1-
100,

Defendants.

CASE NO.: 2:18-cv-03466-DMG-SK

Assigned for all purposes to
The Honorable Dolly M. Gee

DECLARATION OF MARK GERAGOS

**[Filed concurrently with Plaintiffs'
Response To Order To Show Cause
Re: Dismissal For Lack Of
Prosecution]**

I MARK GERAGOS DECLARE,

1. I am an attorney of record for Plaintiffs and I am licensed to practice law before this Court and in this State. If called as a witness I could and would testify to the following.

2. Defendants Ahmed Al-Rumaihi, Ayman Sabi, and Faisal Al Hamidi are the three members of Sport Trinity, LLC. Defendants Al-Rumaihi and Sabi have appeared in this case, and are represented by attorney Brian Hershman of Jones Day. On July 26, 2018, Plaintiffs requested that Mr. Hershman confirm whether his firm represents Defendant Al-Hamidi, but no response to this request was provided. On July 31, 2018, Plaintiffs repeated this request, but to date, it too has been ignored. True and correct copies of these emails are attached as **Exhibit A**.

3. On July 31, a letter brief was filed in the pending proceeding between Big 3 Basketball, LLC—the company operating the professional basketball league at the center of this dispute (the “League”)—and Sport Trinity, LLC—the League’s defaulting purported investor that is owned and controlled by Mr. Al-Rumaihi. A true and correct copy of this letter brief is attached as **Exhibit B**.

4. Attached as **Exhibit C** is a true and correct copy of the Bloomberg Businessweek article “Ice Cube’s Big3 Investors Seek to End Suit Over Qatar Plot,” dated June 18, 2018, <https://www.bloomberg.com/news/articles/2018-06-18/ice-cube-s-big3-investors-seek-to-end-suit-claiming-qatar-plot>.

5. Attached as **Exhibit D** is a true and correct copy of the Washington Post article “Hacked Messages Show Qatar Appearing to Pay Hundreds Of Millions to Free Hostages,” dated April 28, 2018, https://www.washingtonpost.com/world/national-security/hacked-mess...ce2-3f41-11e8-974f-aacd97698cef_story.html?utm_term=.069105146a8a.

6. Attached as **Exhibit E** is a true and correct copy of the Aljazeera article “Defence Minister/ Saudi, UAE Intended to Invade Qatar,” dated February 3, 2018,

1 [https://www.aljazeera.com/news/2018/02/defence-minister-saudi-uae-intended-](https://www.aljazeera.com/news/2018/02/defence-minister-saudi-uae-intended-invoke-qatar-180203091422735.html)
 2 [invade-qatar-180203091422735.html](https://www.aljazeera.com/news/2018/02/defence-minister-saudi-uae-intended-invoke-qatar-180203091422735.html).

3 7. Attached as **Exhibit F** is a true and correct printout of the biography page
 4 for Hassan Al-Thawadi on the World Economic Forum website, last viewed on
 5 August 7, 2018, <https://www.weforum.org/people/hassan-thawadi>.

6 8. Attached as **Exhibit G** is a true and correct copy of the Times London
 7 article “Exclusive/Qatar Sabotaged 2022 World Cup Rivals with ‘Black Ops’,” dated
 8 July 29, 2018, [https://www.thetimes.co.uk/edition/news/exclusive-qatar-sabotaged-](https://www.thetimes.co.uk/edition/news/exclusive-qatar-sabotaged-2022-world-cup-rivals-with-black-ops-glwl3kxkk)
 9 [2022-world-cup-rivals-with-black-ops-glwl3kxkk](https://www.thetimes.co.uk/edition/news/exclusive-qatar-sabotaged-2022-world-cup-rivals-with-black-ops-glwl3kxkk).

10 9. Attached as **Exhibit H** is a true and correct copy of the BBC Sports
 11 article “World Cup 2022: Fifa Need to Conduct “Independent Investigation” Into
 12 Qatar Bid Claims,” dated July 29, 2018,
 13 <https://www.bbc.com/sport/football/44998080>.

14 10. Attached as **Exhibit I** is a true and correct copy of the Mother Jones
 15 article “How the King of New York Kosher Restaurants Helped Qatar Win Over
 16 American Jewish Leaders,” dated June 13, 2018,
 17 [https://www.motherjones.com/politics/2018/06/joey-allaham-nick-muzin-qatar-](https://www.motherjones.com/politics/2018/06/joey-allaham-nick-muzin-qatar-jewish-leaders/)
 18 [jewish-leaders/](https://www.motherjones.com/politics/2018/06/joey-allaham-nick-muzin-qatar-jewish-leaders/).

19 11. Attached as **Exhibit J** is a true and correct copy of the Wall Street
 20 Journal article “Mike Flynn’s Lawyers Say He Is No Longer Joining Consulting
 21 Firm,” dated July 10, 2018, [https://www.wsj.com/articles/mike-flynn-lawyers-say-he-](https://www.wsj.com/articles/mike-flynn-lawyers-say-he-is-no-longer-joining-consulting-firm-1531245600)
 22 [is-no-longer-joining-consulting-firm-1531245600](https://www.wsj.com/articles/mike-flynn-lawyers-say-he-is-no-longer-joining-consulting-firm-1531245600).

23 12. Attached as **Exhibit K** is a true and correct copy of the Haaretz article
 24 “Qatar Used a pro-Israel Businessman to Pay Zionist Organization of America
 25 \$100,000,” dated June 21, 2018, [https://www.haaretz.com/us-news/qatar-used-a-pro-](https://www.haaretz.com/us-news/qatar-used-a-pro-israel-businessman-to-pay-zoa-100-000-1.6197919)
 26 [israel-businessman-to-pay-zoa-100-000-1.6197919](https://www.haaretz.com/us-news/qatar-used-a-pro-israel-businessman-to-pay-zoa-100-000-1.6197919).

1 13. Attached as **Exhibit L** is a true and correct copy of the Politico article
2 “Key Figures in Gulf Crisis Sever Ties with Qatar,” dated June 7, 2018,
3 <https://www.politico.com/story/2018/06/07/qatar-persian-gulf-630039>.

4 14. Attached as **Exhibit M** is a true and correct copy of the FARA
5 registration for Lexington Strategies, LLC, which was filed with U.S. Department of
6 Justice on June 15, 2018.

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8 I DECLARE THE FOREGOING IS TRUE AND CORRECT UNDER
9 PENALTY PERJURY UNDER THE LAWS OF THE UNITED STATES.
10

11
12 DATED: August 8, 2018

GERAGOS & GERAGOS, APC

13 By: /s/ MARK GERAGOS
14 MARK J. GERAGOS
15 BEN J. MEISELAS
16 DAVID A. ERIKSON
Attorney for Plaintiffs
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